

1 Scott A. McMillan, SBN 212506
Michelle D. Volk, SBN 217151
2 The McMillan Law Firm, APC
4670 Nebo Dr., Suite 200
3 La Mesa, CA 91941-5230
Tel. 619-464-1500 x 14
4 Fax. 206-600-5095
Attorneys for Plaintiff, Lycurgan, Inc.

5 LAURA E DUFFY
6 United States Attorney
DANIEL E. BUTCHER
7 Assistant U.S. Attorney
California Bar No. 144624
8 Office of the U.S. Attorney
880 Front Street, Room 6293
9 San Diego, CA 92101
Tel: (619) 546-7696
10 Fax: (619) 546-7751
Email: Daniel.Butcher@usdoj.gov

11 Attorneys for the United States

12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA
14

15 LYCURGAN INC. dba ARES ARMOR,
16

17 Plaintiff

18 v.

19 TODD JONES, in his official capacity as
Acting Director of the Bureau of Alcohol,
Tobacco, Firearms and Explosives,
20

21 Defendants.

Case No.: 14CV1679 JLS (BGS)

JOINT MOTION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S
VERIFIED PETITION FOR RETURN
OF PROPERTY, AND FOR
ATTORNEYS FEES; DEMAND FOR
JURY TRIAL

22
23 Plaintiff and Defendant jointly move for an extension of time for Defendant to
24 file an answer to Plaintiff's Verified Petition (ECF #34) until August 5, 2015.
25 Defendant's answer to the complaint is presently due on July 15, 2015. The
26 justification for this request is as follows: Counsel for Defendant was out of the
27 district on annual leave from July 3, 2015, through July 9, 2015, and needs additional
28 time to evaluate the amended petition and prepare a responsive pleading.

1 The parties therefore jointly move for an order extending the time to respond to
2 Plaintiff's First Amended Complaint to August 5, 2015.

3 DATED: July 10, 2015

Respectfully submitted,

4 LAURA E. DUFFY
5 United States Attorney

6 s/ Daniel E. Butcher
7 DANIEL E. BUTCHER
8 Assistant United States Attorney
9 Attorneys for Defendant

10 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
11 and Procedures of the United States District Court for the Southern District of
12 California, I certify that the content of this document is acceptable to counsel for the
13 Plaintiff and that I have obtained authorization from Scott McMillan to affix his
14 electronic signature to this document.

15 s/Daniel E. Butcher
16 DANIEL E. BUTCHER
17 Assistant U.S. Attorney
18
19
20
21
22
23
24
25
26
27
28